

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

UNITED STATES OF AMERICA

v.

KATHLEEN VARNER

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Case No. 6:18CR00002

**MOTION FOR SUBSTANTIAL ASSISTANCE CONSIDERATION**

Comes now the United States of America, by counsel, pursuant to Section 5K1.1, United States Sentencing Commission Guidelines Manual, and to Title 18, United States Code, Section 3553(e), and moves that **KATHLEEN VARNER** receive consideration for substantial assistance, based upon the fact that **KATHLEEN VARNER** has provided substantial assistance in the investigation and prosecution of another person or persons who have committed offenses.

Respectfully submitted,

THOMAS T. CULLEN  
United States Attorney

/s/ R. Andrew Bassford

R. Andrew Bassford  
Assistant United States Attorney

Dated: March 20, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 20th day of March, 2019, caused to be filed this Motion for Substantial Assistance Consideration with the Clerk of the Court, which will provide a copy to Neil Horn, Esq., Counsel for Defendant.

/s/ R. Andrew Bassford

R. Andrew Bassford

Assistant United States Attorney